

# **Exhibit 6**

1           IN THE UNITED STATES DISTRICT COURT  
          FOR THE NORTHERN DISTRICT OF OHIO  
2           EASTERN DIVISION

3       IN RE:    NATIONAL                                 :   HON. DAN A.  
      PRESCRIPTION OPIATE                             :   POLSTER  
4       LITIGATION                                       :   MDL NO. 2804  
   :

5       This document relates to:             : Case No. 17-MD-2804  
   :

6 The County of Summit, Ohio :  
Ohio et al. v. Purdue Pharma :  
7 L.P., et al., Case No. :  
17-OP-45004 :

8 The County of Cuyahoga v. :  
9 Purdue Pharma Purdue Pharma :  
L.P., et al., Case No. :  
0 18-OP-45090 :

11 - - -  
12 - HIGHLY CONFIDENTIAL -  
SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

14

VOLUME I  
- - -  
May 9, 2019

16 Videotaped deposition of  
CRAIG J. McCANN, Ph.D., CFA, taken  
17 pursuant to notice, was held at the law  
offices of Morgan Lewis & Bockius, LLP,  
18 1111 Pennsylvania Avenue, NW, Washington,  
D.C., beginning at 10:03 a.m., on the  
19 above date, before Michelle L. Gray, a  
Registered Professional Reporter,  
20 Certified Shorthand Reporter, Certified  
Realtime Reporter, and Notary Public.

22 GOLKOW LITIGATION SERVICES  
23 877.370.3377 ph | 917.591.5672 fax  
deps@golkow.com

1           Q.     And, in fact, the data that  
2     you looked at for Cardinal went back  
3     farther in time than the data that you  
4     had for any other defendant, right?

5           A.     Yes.

6           Q.     Earlier today you've given  
7     testimony and it's set forth in your  
8     report, that whenever one of your methods  
9     flagged a transaction, then you would  
10    flag every subsequent transaction from  
11    that date going forward, correct?

12          A.     Yes.

13          Q.     And that flagging for  
14    subsequent transactions was automatic,  
15    right?

16          A.     Yes.

17          Q.     In other words, you didn't  
18    do any further analysis of the subsequent  
19    transactions to measure them in any way.  
20    They were automatically flagged, right?

21          A.     Yes.

22          Q.     Given your use of this "flag  
23    every subsequent transaction" approach,  
24    the question of how far back in time

1     you're looking at a particular  
2     distributor's transactional data could  
3     have significant implications in terms of  
4     the total numbers of orders that are  
5     getting flagged under your methodologies,  
6     correct?

7             A.     It's a little bit more  
8     subtle than that. But I agree with the  
9     general implication, yes, that the  
10    further back in time you go, if there's a  
11    big increase over time in shipments,  
12    you're flagging more orders for the  
13    distributors that you go back further in  
14    time with.

15            Q.     So if you're going back in  
16    time all the way to 1996 for one  
17    distributor, but you're only going back  
18    in time to 2004 or 2005 or 2006 for  
19    another distributor, you would expect  
20    that under your approach where you're  
21    flagging everything subsequent to a first  
22    flagged transaction, that for the  
23    distributor where you are going back  
24    farther in time, under your

1 methodologies, you are going to end up  
2 flagging more transactions, right?

3 A. Again, it's a little bit  
4 more complicated, because it depends on  
5 the pharmacy turnover, you know, how long  
6 the relationship lasts between a  
7 distributor and a pharmacy. And it  
8 depends on the general trend, up or down,  
9 in the data. But in this application, I  
10 think in general what you're saying is  
11 correct.

12 Q. And why is what -- to  
13 anybody who may not be in the weeds of  
14 this as much as we are, explain why what  
15 I'm saying in general is correct?

16 A. Well, as I've presented the  
17 stylized fact, the amount of prescription  
18 opioids increases significantly from 1997  
19 to 2010 or '11. We saw that in Section  
20 10 of my report.

21 And if Cardinal Health, for  
22 instance, and some other distributor,  
23 Distributor B, both were shipping from  
24 1997, but for some reason Distributor B

1     only produced data from 2002 in  
2     discovery, we would start observing  
3     Distributor B's data at a higher level  
4     than the levels we first were observing  
5     Cardinal Health's shipments.

6                     And so the Cardinal Health  
7     shipments obviously before the  
8     Distributor B's data is produced, none of  
9     those get flagged, because there is no  
10    data produced by Distributor B; whereas,  
11    given my stylized hypothetical, a bunch  
12    of the Cardinal Health shipments may be  
13    flagged.

14                    And then separate and apart  
15    from that, because some of these  
16    thresholds, at least with respect to the  
17    first -- it doesn't have any impact on  
18    two, three, four or five, I don't think.  
19    But with respect to the first one, the  
20    relationship, the first six months for  
21    Cardinal Health and a pharmacy, is at a  
22    lower level. And so more of the  
23    subsequent orders get flagged.

24                    Q.     So it's fair to say that